

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

IN RE PORK ANTITRUST
LITIGATION

Civil No. 18-cv-01776-JRT-HB

This Document Relates to:

All Consumer Indirect Purchaser Actions

**STIPULATION TO AMEND THE PRETRIAL SCHEDULING
ORDER REGARDING DEADLINE ON STRUCTURED DATA**

The undersigned parties (“Parties”) stipulate and hereby request, under Federal Rule of Civil Procedure 16(b)(4) and D. Minn. L.R. 16.3, to amend the Court’s March 3, 2021 Order on Stipulation to Amend the Pretrial Scheduling Order Regarding Deadline on Structured Data (ECF No. 717), to extend from March 9, 2021, to March 29, 2021 the deadline to reach agreement on production of structured data or seek relief from the Court.

Good cause exists for amendment of the schedule to extend such deadline as set forth below:

1. The first deadline to reach agreement on production of structured data or seek relief from the Court was January 15, 2021.
2. On Jan. 15, 2021, the Court extended this deadline to February 23, 2021, and again to March 2, 2021 and March 9, 2021.
3. The Parties have had substantive discussions on the production of structured data and continue to make progress on reaching a resolution or, in the alternative, limiting the issues to be presented to the Court.
4. Included in the discussions are an effort between the Parties to clarify the categories of pork products involved in this litigation. The Parties require additional time to both investigate these issues and to digest the information. The Parties propose that:
 - a) During the week of March 15, 2021, defendants will make good-faith, reasonable efforts to provide plaintiffs with additional information regarding the categories of products each defendant sold during the class period and channels those products are sold into. The list will be provided for each defendant.
 - b) By March 22, 2021, the Parties will meet and confer to determine whether or not certain categories of these pork products may be excluded from the definition of Pork Products used in this case.
 - c) These are interim deadlines that the Parties may move by agreement.

5. The Parties therefore collectively request that the deadline to reach agreement on production of structured data or seek relief from the Court be moved to March 29, 2021. The Parties do not request that any other deadline under the Pretrial Scheduling Order be moved or extended.
6. This request is being made to further efficient and cooperative case management. It is not being made for the purpose of delay, and the requested extension would not delay the resolution of this matter or prejudice any party.

DATED: March 9, 2021

Respectfully submitted,

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